

EXHIBIT A

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[Additional Counsel Listed on Following Pages]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

Judge: Honorable Charles Breyer

This Document Relates to:

ALL ACTIONS

**DECLARATION OF SCOTT BINNINGS
IN SUPPORT OF DEFENDANTS' JULY
18, 2025 BRIEF PURSUANT TO SPECIAL
MASTER ORDER NO. 4, § II (JUNE 6,
2025 PRIVILEGE LOG CHALLENGES)**

DECLARATION OF SCOTT BINNINGS

I, Scott Binnings, having personal knowledge of the following state:

1. I am the Associate General Counsel, Safety and Core Services, at Uber. I was first employed by Uber in April 2015 and have worked as in-house legal counsel for the past 10 years. My previous positions included Senior Counsel, Regulatory; Senior Counsel, Safety; Legal Director, Safety; Senior Legal Director, Safety; and Senior Legal Director, Safety, Payments, and Risk. In my

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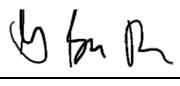
Case No. 3:23-MD-3084-CRB

current role, as has been the case throughout my tenure at Uber, I am responsible for providing legal advice to Uber’s leadership and employees related to safety issues, procedures, and policy, among other legal advice. I offer this Declaration in the above-captioned matter in support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC’s July 18, 2025 Brief Pursuant to Special Master Order No. 4 § II (ECF 2933). The facts set forth herein are true and correct and are based on my own personal knowledge, and I could and would competently testify thereto if called.

2. JCCP_MDL_PRIVLOG105576 is a confidential spreadsheet titled “A/C Privileged – Trends in Cancellation Rates and Ratings by Gender _ User Audit.” My colleague, Nicole Benincasa, a Senior Counsel on Safety Legal, and I worked closely with the team that compiled trend information on ride cancellations in order to provide the company with legal advice on user deactivations. This spreadsheet contains information gathered to facilitate our legal advice and was prepared with the legal team’s involvement and advice throughout the process. I recall providing input on the type of data that needed to be captured as part of this spreadsheet so that I could provide my legal advice, and I have reviewed related correspondence where my legal advice was sought and provided.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 17, 2025.

By: /s/ 
Scott Binnings